

**LOCAL BANKRUPTCY FORM 9013-3****IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA****IN RE:**

**Anthony J. Oliveri, Jr. and  
Debra Lynn Oliveri**

**Debtor(s)**

**Citizens Bank, N.A. or its  
Successor or Assignee**

**vs.**

**Anthony J. Oliveri, Jr. and  
Debra Lynn Oliveri Jack N  
Zaharopoulos, Chapter 13  
Trustee**

**Plaintiff(s)/  
Movants****Defendant(s)/  
Respondent(s)**

**CHAPTER 13  
CASE NO. 5:23-bk-02286-MJC  
ADV. NO. - -ap-  
NATURE OF PROCEEDING: Hearing on Motion For Relief From Stay  
DOCUMENT No. 28**

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

The parties are attempting to settle the matter and need additional time to determine if the matter can be resolved. The parties are requesting a 30-day adjournment.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: January 23, 2024

/s/ Andrew M. Lubin  
Applicant's Signature

<sup>1</sup> No alterations or interlineations of this document are permitted.

<sup>2</sup> If this is not a first request for a continuance, then a Motion to Continue must be filed.